

EXHIBIT J

Discrimination - equal Treatment of people Aware of his policy
 Harassment make people unreasonably unhappy - Sexual Harassment
 male / female unhappy - "touch"
 Hostile Environment - unreasonably unhappy - too much pressure -
 Sexual Orientation - no discrimination given to men
 National origin - no discrimination - as far as capable
 work well with others

China -

Summer 2004 Jim Yue and Anne in London - discussed
 business - Mr Zhang invited Jim to China trying to expand
 business - New person hired in Germany in January time became
 Furuchi suggested German came to Tok and then to China
 So Trip set for April Jim invited also - Jim invited to Japan
 (motivate him - Takahashi not so strong as Jim) Thought Chinese
 business would make Takahashi appreciate Jim more - Jim came
 Sunday night - then two days in Tok meeting with customers and
 in house - Wed - went to China - Anne meeting and plant tour
 Then Chinese dinner eating and drinking (not sure about Bar) over
 about mid-night, Then Bath house (as usual) Jim asked to join
 explained what would happen - Jim agreed to go (knows Jim
 is into Asia culture - went to his room apt. saw asian things)
 If Jim wanted to go back no problem, Taxi
 Bath house very usual so not good memory - Everyone happy no one
 unhappy to be there - 1 hour massage - went back to hotel
 Next day went to Shanghai - Furuchi went to customer
 Mr Yue and Jim went to talk to Mfg (called by Mr Karen)



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Nangiro - Went to dinner with another Chinese customer
 Jim and Karen went back to hotel (Forever with for insurance)
 Friday meeting and then took car to Beijing dinner
 Then went. Saturdays Jim went sight seeing. Great wall, etc.

#10 Supervisor - no evaluation but could comment on performance
 Fuji and Takahashi did not ask - Forevich wanted them to
 appreciate Jim - Discusses general business issues like accounts
 rec. (wanted to protect Jim) - He manages business but not people
 Commented to Torao son on specifics - making business trip
 No one manages monitored. More instruction for Torao - than Jim
 Targets - German Mills involved most manage an world wide) cars, no
 all budgets to managers world-wide - In MIC involved bottom line
 make sure it's reasonable - NOT sure how bonus target related to
 sales vol. He sets over all not sure how. Forevich is concern
 about proper use of time and schedule for business.

#11 MR Zhang drove car and made plans - accurate

#12 may have gone - NOT sure if went or not - every selected by Anne
 Side - May have said you will be target - Meaning drinking.
 "You are target before dinner" means drinking - Does NOT remember
 specifically)

#13/14 - Does not remember time - Does not remember Jim & Karen
 Very tired - If insists he would have gone back to hotel

may have said not sexual message - Both house close to hotel

#15 NOT TRUE - Does not remember - NOT interested

#16 May have said (not remember) Did not start if you saw
 Perhaps - NOT prone to talk about this - Jim proud of
 being Italian so they know this about him

On several points above when pressed he did not recall at all and was trying to think in what context something may have happened if in fact it did #12, 16, 19, 20

#17 Not sure if Zheng there NOT sure

#18 Yue commented not greeted - pretty sure he did not touch - Does not like to touch - Yue is more touchy

#19 - Does not remember ^{on} - Mr Yue may have cell phone. Do not remember ^{on} - Yue could have taken picture (prone to act like child)

#20 - If taken Mr Yue would have deleted Mr Furechi would have insisted

#21 Could have said (not at all)

#22 - No reaction from Jim

#23 OL - NOT sure how got back

#24 Jim / Furechi went to FLA - Several times

#25 - Comments - best person to create new business lack of management or res. Comment to Tolo BO managers may be Tolo's -

As sales - Jim is 4 (1-5) 4 or 5 years did very good

2003 - 2004 OL level

2004 Last 3 years Eastern Ribbon (Jim - Acc violate internal credit rules End 2005 perf. deteriorated)

- 1- Moved to LI - solo Apt no monetary motivation
- 2- Limited promotion opportunity - NOT well thought of by Takahashi - (ignored him)
- 3- Today tighter control on credit, travelling (related perf) Thinks MC paper group in tightening
- 4- NY pushed to create ~~new~~ account

What happened: a Tapp!

Assess his credibility - recollection - disparities

- Complaint Allegations paragraph 10 → 26
where did he have authority and where not
- Evaluation process
- Determination of the bonus - bonus amounts 2004-2005
- Formula
- What power did he have over Jiri?

EEO-1

What is your understanding of the legal understanding of Sexual Harassment.

National Origins

Sexual Orientation

Retaliation - understanding of prohibition against it.

Is he aware of our policies?